



## Goddard Procedural Requirements

**DIRECTIVE NO.** GPR 1700.6  
**EFFECTIVE DATE:** February 4, 2006  
**EXPIRATION DATE:** February 4, 2011

**APPROVED BY Signature:** Original Signed By  
**NAME:** Edward. J. Weiler  
**TITLE:** Director

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### COMPLIANCE IS MANDATORY

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**Responsible Office:** Code 250/Safety and Environmental (S&E) Division

**Title:** Confined Space Program at the Goddard Space Flight Center (GSFC)

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## PREFACE

### P.1 PURPOSE

This directive establishes requirements for practices and procedures to protect employees who enter confined space work locations at GSFC as defined by the Occupational Safety and Health Administration (OSHA) Standards.

### P.2 APPLICABILITY

This directive applies to all government and contractor confined space entries associated with industrial operations at GSFC, including Greenbelt, Wallops Flight Facility (WFF), and remote locations under GSFC control. Confined space entries associated with construction activities are covered under 29 CFR 1926.21(b)(6)(i). This directive shall apply to all operations involving confined spaces, or potentially hazardous atmospheres. For GSFC contractors, this directive is applicable as specified in the contract clauses for the particular contract by NASA FAR Supplement 1823.7001 NASA Safety and Health Solicitation Provisions and Contract Clauses. The term "Safety Office" is applicable equally to both the Greenbelt (Code 250), and WFF (Code 803) safety organizations.

### P.3 AUTHORITY

- a. NASA Policy Directive (NPD) 8700.1, NASA Policy for Safety and Mission Success
- b. NPD 8710.2, NASA Safety and Health Program Policy
- c. NPR 8715.3, NASA Safety Manual

### P.4 REFERENCES

- a. 29 Code of Federal Regulations (CFR) 1910.146, Permit-Required Confined Spaces
- b. 29 CFR 1910 Subpart Z, Toxic and Hazardous Substances
- c. American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values (TLV) for Chemical Substances and Physical Agents & Biological Exposure Indices
- d. Form 23-52 – GSFC Confined Space Entry Permit
- e. NASA FAR Supplement 1823.7001, NASA Safety and Health Solicitation Provisions and Contract Clauses
- f. WSM 2002 Entering Confined Spaces (WFF ONLY)
- g. 29 CFR 1926.21(b)(6)(i), Safety Training and Education

CHECK THE GSFC DIRECTIVES MANAGEMENT SYSTEM AT  
<http://gdms.gsfc.nasa.gov> TO VERIFY THAT THIS IS THE CORRECT VERSION PRIOR TO USE.

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## **P.5 CANCELLATION**

Goddard Management Instruction 1780.1, Goddard Space Flight Center Confined Space Policy

## **P.6 SAFETY**

Use one or more of the hazard analysis tools appropriate to this activity, such as the Task Safety Analysis or the Chemical Lab Safety Analysis tools or equivalent found at:

<http://safety1st.gsfc.nasa.gov/>.

## **P.7 TRAINING**

- a. Personnel who enter confined spaces, or are responsible for facilities/equipment that have confined spaces, shall take a confined space training course that meets OSHA requirements. As set forth in their contracts, contractors are responsible for obtaining training for their personnel, and ensuring all subcontractors have met OSHA and NASA training requirements. Initial and refresher training shall include the course content requirements as defined by 29 CFR 1910.146(g). Personnel shall be retrained as required by OSHA.
- b. All personnel that complete the training shall be required to pass a written examination that adequately measures the knowledge and understanding of the requirements, policies, and procedures applicable to entering confined spaces.
- c. Personnel designated to conduct atmospheric testing of confined spaces shall also be trained in the requirements above, and in the operation, calibration, and care of specific testing equipment to be used. Individuals conducting atmospheric tests must be qualified to interpret the test results.
- d. Managers and/or supervisors shall maintain current training records, as well as training requirements for each employee tasked to perform confined space entry activities and documentation shall be in writing. The Safety Office will oversee the respective programs to ensure only trained personnel enter confined spaces.

## **P.8 RECORDS**

CHECK THE GSFC DIRECTIVES MANAGEMENT SYSTEM AT  
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Entry into a permit space must be authorized by the Entry Supervisor using GSFC Form 23-52, GSFC Confined Space Entry Permit.

<b>Record Title</b>	<b>Record Custodian</b>	<b>Retention</b>
Form 23-52 Entry/Evaluation Permit or equivalent form	Organization/Supervisor of Employees Entering Confined Spaces	* <u>NRRS 8/38B</u> . Destroy when 5 years old
Certificate of Confined Space Training	Human Resources, Supervisor of Employee and Codes 250/803	* <u>NRRS 3/33G1</u> . Destroy 5 years after employee discontinues or completes training
Annual Review of the Confined Space Entry Program	Organizations Conducting Confined Space Operations and Codes 250/803	<u>NRRS 1/125A</u> . *Destroy when 10 years old or when superseded or obsolete, whichever comes first
List of Permit Required Confined Spaces	Organizations Who Manage the Confined Space and Codes 250/803	<u>29 CFR 1960.73</u> . Records and reports shall be retained for 5 years following the end of the fiscal year to which they relate

*\*NPR 1441.1 – NASA Records Retention Schedules*

## **P.9 METRICS**

Organizations that conduct confined space entry activities, as a minimum, shall collect the following data to monitor trends and lessons learned which will be provided to line organizations and briefed to senior GSFC management as necessary:

- Listing of permit-required confined spaces in their work areas, and the number of spaces added to the base list over the last year.
- Number of submitted permits annually.
- Prioritized listing of most frequent hazards encountered and abatement/control measure actions.
- Number of employees identified for confined space training and annual completion rates.

## **P.10 DEFINITIONS**

- Acceptable Entry Conditions – The conditions that shall exist in a confined space location to allow entry and to ensure that employees involved with confined space operations can safely enter into, and work within the space.

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- b. Attendant – An individual stationed outside one or more permit-required spaces, who monitors the authorized entrants and who performs all attendant’s duties assigned in the organization’s Confined Space Program.
- c. Authorized Entrant – An employee who is authorized by the employer to enter a confined space.
- d. Confined Space – A space that is:
  - (1) Large enough, and so configured that an employee can bodily enter and perform assigned work,
  - (2) Has limited or restricted means for entry or exit, and
  - (3) Is not designed for continuous occupancy.

Confined spaces generally include, but are not limited to tanks, vaults, vessels, storm water/sewer systems, telecommunications tunnels, shipping containers/transporters, underground piping, raised floor areas, clean tents, bins, boilers, ventilation or exhaust ducts, manholes, digesters, ovens, kilns, pulpers, tunnels, furnaces, degreasers, test chambers, vats, certain locations within aircraft and spacecraft when not in flight, pipelines, and similar restrictive locations. Open top spaces more than four feet in depth, such as pits, tubs, vaults, vessels, trenches, and excavations may also be designated as confined spaces under certain circumstances.

- e. Downgraded (reclassified) Confined Space – A downgraded confined space is a confined space previously classified as a permit-required confined space. Permit-required confined spaces can be reclassified as non-permit confined spaces only once it is proven that all actual or potential hazards within and around the space have been eliminated, and will remain eliminated for the full duration personnel are within the space (29 CFR 1910.146, (c)(7)).
- f. Engulfment – The surrounding and effective capture of a person by a liquid or finely divided (flowable) solid substance that can be expected to cause death or serious physical harm by filling or plugging the respiratory system, or that can exert enough force on the body to cause critical injury/death by strangulation, constriction, or crushing.
- g. Entry – Entry into a confined space occurs as soon as any part of the entrant’s body breaks the plane of an opening into the space.
- h. Entry Permit – The written permit defining the conditions under which a permit-required confined space may be entered (see below).
- i. Entry Supervisor – The person (such as employer, foreman, or crew chief) responsible for determining if acceptable entry conditions are present at either a permit-required space or non-permit-required space where entry is planned, for authorizing entry and overseeing entry operations, based on the pre-entry evaluation, and for terminating entry as required by this section.

- j. **Hazardous Atmosphere** – An atmosphere that exposes employees to a risk of death, incapacitation, injury, or acute illness from one or more of the following causes:
- (1) A flammable gas, vapor, or mist in excess of 10 percent of its Lower Flammable Limit;
  - (2) An atmospheric oxygen concentration below 19.5 percent or above 23.5 percent;
  - (3) A combustible dust environment;
  - (4) An atmospheric concentration of any substance for which exposure would exceed the Permissible Exposure Limit (PEL) or TLV, whichever is more stringent; and
  - (5) Any atmospheric condition recognized as immediately dangerous to life or health.
- k. **Immediately Dangerous to Life or Health (IDLH) Condition** – Any condition that poses an immediate threat of loss of life or physical injury or that may result in irreversible or immediate, severe health effects or other conditions that could impair escape from the confined space. If entry into an IDLH condition is required, rescue personnel and equipment shall be standing by the site.
- l. **Non-Permit-Required Confined Space** – A confined space that does not contain, or with respect to atmospheric hazards have the potential to contain, any hazard capable of causing death or serious physical harm. Examples include vented vaults, motor control cabinets, and dropped ceilings. Although they are technically defined by OSHA as confined spaces, these spaces have either natural or permanent mechanical ventilation to prevent the accumulation of a hazardous atmosphere, and they are not likely to present suffocation, engulfment or other serious hazards.
- m. **Occupational Exposure Limit** – Goddard consensus on the amount of a chemical or physical stressor that a person may be exposed to over a working lifetime without suffering ill effects from the exposure. These limits are taken from either the OSHA PELs; published in 29 CFR 1910.1000, tables Z-1, Z-2, or Z-3, or the most current ACGIH TLV guide. Goddard will use whichever is the most stringent standard of the two.
- n. **Permit-Required Confined Space** – A confined space that has the potential to contain an IDLH hazardous atmosphere, or contains one or more of the following:
- (1) A material/substance that has the potential for suffocating an entrant;
  - (2) A material/substance that has the potential for engulfing an entrant;
  - (3) A material/substance that poses a probable shock hazard;
  - (4) An internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor sloping downward and tapering to a smaller space; and
  - (5) Any other recognized serious safety or health hazards likely to cause death or serious physical harm to the occupant(s), to include any hazard introduced into the space that is required as part of the work being performed within the space, such as coating, cleaning materials, hot work, i.e., welding, cutting or brazing, for which specific permits are required.
- o. **Testing** – The process by which the hazards that may confront entrants of a permit space are identified and evaluated. Testing enables employers to devise and implement adequate control measures for the protection of authorized entrants and to determine if acceptable entry conditions are present immediately prior to entry, during entry, and re-entry following extended periods of

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time. Testing includes specifying the tests that are to be performed in the permit space and the maintenance of a written record of test results at the location of the test site.

- p. Two-Person Rule - A system of organizing employees into work groups for hazardous work activities in such a manner that each employee of the work group is designated to be observed by at least one other employee in the work group. The purpose of the Two-Person Rule is to provide rapid assistance to employees in the event of an emergency.

## PROCEDURES

**In this document, a requirement is identified by “shall,” a good practice by “should,” permission by “may” or “can,” expectation by “will” and descriptive material by “is.”**

### 1. CONFINED SPACE OPERATIONS

These procedures define requirements to reduce significantly accidental injury and death associated with entering, working in, and exiting from, confined spaces. They are designed not only to make the confined space safe for the worker, but also to make the worker cognizant of the hazards associated with this work area and the safe work practices necessary to deal with these hazards. Conditions deemed unacceptable for safe operations will necessitate appropriate safeguards, including adequate control measures for all specific and/or potential hazards identified and documented during the preparation of an entry permit that is signed and issued by an authorized entry supervisor.

### 2. CONFINED SPACE POLICY

Safe practices, applicable to all civil service personnel, contractors, and non-contractors performing operations at GSFC facilities, are in place to prevent exposure to unsafe conditions prior to entering, and while working within, non-permit-required and permit-required confined spaces. Unsafe conditions include exposure to hazardous atmospheres, including potential contact hazards such as steam burns and electrical shock, and engulfment and drowning. Dangerous air contamination within a confined space is any atmosphere presenting risk of suffocation, health impairment, contact injury, disablement, or death. Examples include:

- Combustible or flammable gases and vapors at concentrations in excess of 10 percent of the lower explosive limit,
- An oxygen concentration less than 19.5 percent or greater than 23.5 percent by volume, and
- Toxic substances present at concentrations in excess of their occupational exposure limits.

### 3. ROLES AND RESPONSIBILITIES (CIVIL SERVICE AND CONTRACTORS)

#### 3.1 Division Chiefs shall:

Ensure that civil service employees, onsite mission support, and construction contractors in their Divisions are informed of, and adhere to, GSFC Confined Space Policy.

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### 3.2 Center Safety Organizations shall:

- a. Provide information and consultation as necessary to project management and employees involved in confined space operations;
- b. Review confined spaces procedures for specific projects, at the request of managers or supervisors;
- c. Review at least annually this directive and the effectiveness of the confined space program as outlined herein;
- d. Coordinate with the Career Development and Employee Worklife Office Career Development and Training Group (Code 114) to make training in confined spaces procedures available to civil service staff;
- e. Using confined spaces regulations, assist GSFC management in making appropriate decisions about confined spaces in their areas of operation;
- f. Provide contract and specification review as requested by GSFC management;
- g. Function as the regulatory liaison with regulatory agencies as needed for confined space entries;
- h. Ensure compliance with standards set forth in the program by periodic inspection of entry sites and canceling permits where unsafe conditions are present; and
- i. Elect to provide more stringent controls and oversight of their respective confined space programs provided all minimum requirements established within this document are complied with.

### 3.3 Confined Space Authorized Entry Supervisors and Managers shall:

Have overall responsibility for the approval for entry into and work conducted within confined spaces. As such, they are responsible for ensuring that the requirements of this directive are implemented. If uncertainty exists, entry supervisors shall request assistance from Safety Office personnel who will resolve questions about whether a location meets the criteria of an OSHA-defined confined space, or a permit-required confined space, prior to any confined space entry.

Proper application of the decision flow chart (diagram 7.0) will facilitate initial compliance with this requirement. In the event that the confined space contains hazards that pose potential danger to entrants or occupants, the responsible organization shall:

- a. Develop and implement a written Permit-Required Confined Space Program that is consistent with provisions outlined with 29 CFR 1910.146, "Permit-Required Confined Spaces." The written program shall be available for inspection by employees and their authorized representatives;
- b. Evaluate and approve entry by permit and/or operating procedures and prepare a written Entry Permit if necessary;
- c. Review equipment to be used;
- d. Ensure that atmospheric measuring equipment is installed, calibrated, maintained, and used properly;
- e. Identify and post as such those areas considered permit required confined spaces;
- f. Ensure that personnel designated as confined space entrants have received appropriate confined space training;
- g. Conduct and certify initial atmosphere tests and retests as deemed necessary to ensure that all appropriate safety measures are being taken for maximum safety protection and;



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- (1) Perform confined space pre-entry evaluations with emphasis on hazard recognition, evaluation, and control;
  - (2) Classify a confined space as a permit-required or non-permit required space based on actual and potential hazards associated with the confined space and the work to be performed; and
  - (3) Identify necessary controls and procedures for worker safety.
- h. Notify the Emergency Console (Fire Department Dispatcher at WFF) of the date, time, and location of a Permit-Required Space Entry to obtain permission from the Console. Entry will not occur unless the Console can coordinate rescue support from the local Fire Department.
- i. Control access to their respective managed confined spaces. Specifically, they shall:
- (1) Ensure all confined spaces are controlled through the use of locks or other measures that prevent unauthorized personnel from entering,
  - (2) Ensure that all permit required confined spaces within their control are properly placarded with appropriate signage,
  - (3) Ensure that all personnel working within their respective facilities or areas are aware of all permit required confined spaces and the specific hazards they pose, and
  - (4) Coordinate with the Safety Office for assistance in evaluating and documenting the actual and/or potential hazards within all identified confined spaces.
- j. Ensure that all control measures for safety of personnel are taken, including availability of communication equipment, notification of rescue personnel prior to the start of confined space entry, and proper Personal Protective Equipment (PPE), tools, and materials are on hand and utilized as required on the Confined Space Permit.
- k. May serve as an attendant, or as an authorized entrant, as long as that person is trained and equipped as required by this section for each role he or she fills. Also, the duties of the Entry Supervisor may be passed from one individual to another during the course of the entry operation.

### **3.4 Confined Space Authorized Entrants shall:**

- a. Recognize the conditions and hazards of work requiring the utilization of confined space procedures including mode, signs, symptoms, and consequences of exposure, and
- b. Use the materials, equipment, and procedures specified in their written procedures to implement the Confined Space Program.

### **3.5 Attendant shall:**

- a. Know the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of the exposure;
- b. Be aware of possible behavioral effects of hazard exposure in authorized entrants;
- c. Continuously maintain an accurate count of authorized entrants in the permit space and ensures that the means used to identify authorized entrants accurately identifies who is in the permit space;
- d. Remain outside the permit space during entry operations until relieved by another attendant;
- e. Communicate with authorized entrants as necessary to monitor entrant status and to alert entrants of the need to evacuate the space under paragraph (i)(6) of this section;
- f. Monitor activities inside and outside the space to determine if it is safe for entrants to remain in the



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space and orders the authorized entrants to evacuate the permit space immediately under any of the following conditions;

- (1) If the attendant detects a prohibited condition;
  - (2) If the attendant detects the behavioral effects of hazard exposure in an authorized entrant;
  - (3) If the attendant detects a situation outside the space that could endanger the authorized entrants;
  - (4) If the attendant cannot effectively and safely perform all the duties required.
- g. Summon rescue and other emergency services as soon as the attendant determines that authorized entrants may need assistance to escape from permit space hazards;
- h. Take the following actions when unauthorized persons approach or enter a permit space while entry is underway:
- (1) Warn the unauthorized persons that they must stay away from the permit space;
  - (2) Advise the unauthorized persons that they must exit immediately if they have entered the permit space;
  - (3) Inform the authorized entrants and the entry supervisor if unauthorized persons have entered the permit space and;
  - (4) Perform no duties that might interfere with the attendant's primary duty to monitor and protect the authorized entrants.

### **3.6 Contracting Officers shall:**

Enforce contract specifications if records of required training cannot be produced, or if confined space procedures are found to be deficient with respect to this document.

### **3.7 Onsite and Construction Contractors shall:**

- a. Submit, as part of their contracts, any required Safety Plan, a Confined Space Program (if required) that meets the provisions of this directive; and
- b. Make available upon request training and authorization records that meet the requirements of the training section in this document.

## **4. CONFINED SPACE PERMIT PROCEDURE**

The proper use of confined space entry permits comprises the following actions:

- a. The Entry Supervisor shall document, before entry into a permitted space is authorized, that the space has been evaluated and is safe to enter. Information shall be annotated on the Confined Space Entry Permit; and
- b. The Entry Supervisor, attendant, and entrant(s) shall verify that all necessary precautions have been taken to ensure safety, and then sign the Entry Permit.

The Entry Supervisor shall terminate entry and cancel the Entry Permit when:

- a. A condition that is not allowed under the permit arises in, or near, the permit space, e.g., emergency, change in atmosphere, etc.; or
- b. When the job is completed, all entrants have exited the space, and the space is ready to be returned

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to service.

Permit-required confined space procedures will be enhanced by the use of area and/or job-specific procedures. Confined space work often involves trade-skilled individuals routinely working in areas that are permit required spaces. In some cases, the work is preventative maintenance that already has specific work procedures; thus, the confined space requirements for working in such an area can be added to the written work procedures as long as they meet the requirements of this directive.

#### **4.1 Confined Space Entry Permit Posting**

At the time of entry, the Entry Supervisor shall make available to all authorized entrants and the attendant the completed Entry Permit. The Entry Permit may be posted at the entry portal or made available by other equally effective means; so that both entrant and attendant can confirm that pre-entry preparations have been completed. Danger signage shall also be posted to inform personnel working in the immediate area.

#### **4.2 Confined Space Entry Permit Duration**

The duration of the Entry Permit shall not exceed the time required to complete the assigned task or job identified on the Entry Permit. In addition, the duration of an Entry Permit must not extend beyond one shift with the same crew. If a new crew arrives, a new Entry Permit must be completed. Consideration to deviate from this requirement may be made if the organization can provide written control methods that will ensure the level of safety is not reduced.

#### **4.3 Reclassifying (Downgrading) Permit-Required Confined Spaces**

Organizations that have personnel that enter confined spaces, or have confined spaces within their respective facilities, or areas for which they are responsible, may reclassify permit-required confined spaces provided they have met the following requirements:

- a. A detailed written and approved procedure/analysis that details the decision-making process in downgrading procedures;
- b. Compliance with all requirements and stipulations established with OSHA 29 CFR 1910.146 for reclassifying permit required confined spaces;
- d. Specific training provided to all designated personnel that covers the organizations' procedures in reclassifying permit required spaces.

Only the Safety Office can approve the reclassification of a permit-required space to a non-permit required space.

#### **4.4 Alternative Procedures for Entering Confined Spaces**

An organization may use alternate procedures for entering a permit-required space under the conditions set forth below:

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- a. The organization can demonstrate that the only hazard posed by the permit space is an actual or potential hazardous atmosphere;
- b. The organization can demonstrate that continuous forced air ventilation alone is sufficient to maintain that permit space safe for entry; or
- c. The organization develops monitoring and inspection data that supports the demonstrations required by paragraph (c)(5)(i) of 29 CFR 1910.146.

Continuous forced air ventilation shall be used, as follows:

- a. An employee may not enter the space until the forced air ventilation has eliminated any hazardous atmosphere,
- b. The forced air ventilation shall be so directed as to ventilate the immediate areas where an employee is, or will be present within the space and shall continue until all employees have left the space,
- c. The air supply for the forced air ventilation shall be from a clean source, and may not increase the hazards in the space, and
- d. The atmosphere within the space shall be periodically tested as necessary to ensure that the continuous forced air ventilation is preventing the accumulation of a hazardous atmosphere. Any employee who enters the space, or that employee's authorized representative, shall be provided with an opportunity to observe the periodic testing required by this paragraph.

If a hazardous atmosphere is detected during entry:

- a. Each employee shall leave the space immediately,
- b. The space shall be evaluated to determine how the hazardous atmosphere developed, and
- c. Measures shall be implemented to protect employees from the hazardous atmosphere before any subsequent entry takes place.

## 5. CONFINED SPACE RESCUE

Prior to starting any operation involving entry into permit required confined spaces, the Entry Supervisor shall coordinate the operation with Code 240 Emergency Services (Fire Department Dispatcher at WFF). Emergency Services are required to know the place, time, duration, and activity of the entry operation. No entry shall take place until the Emergency Console has coordinated rescue services with the local Fire Department. The "Two-Person Rule" is in effect for all entries into permit-required confined spaces.

### 5.1 Confined Space Emergency Retrieval Systems

To facilitate non-entry rescue, appropriate retrieval systems or methods shall be used whenever an authorized entrant enters a permit-required confined space, unless the retrieval equipment would increase the overall risk of entry or would not contribute to the rescue of the entrant. Retrieval systems shall meet requirements outlined in 29 CFR 1910.146.

### 5.2 Confined Space Entry Rescue

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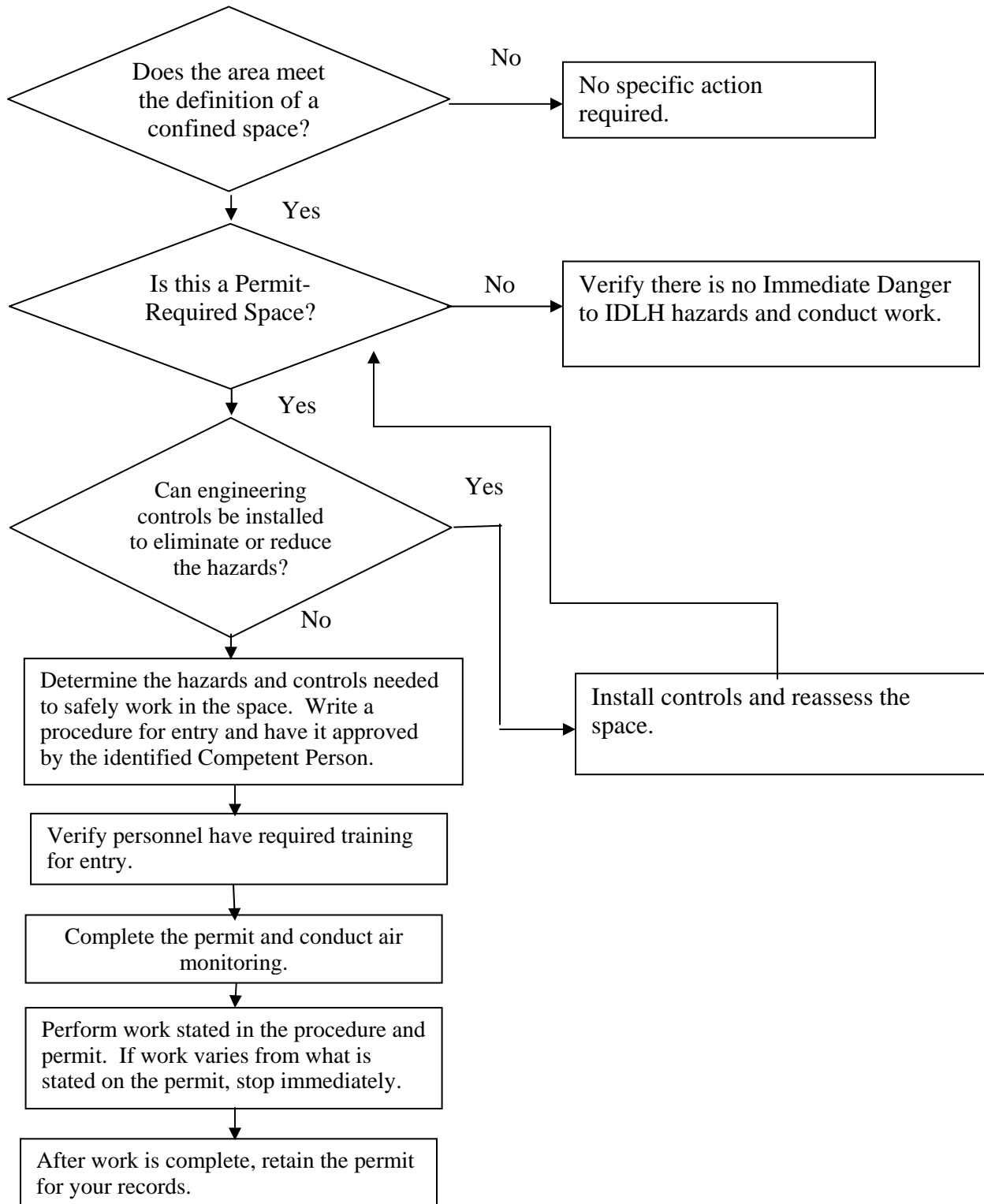
If, in the course of a non-permit or permit-required confined space entry, an attendant becomes aware that an entrant requires assistance in escaping from the confined space, the attendant will summon rescue and other emergency services by notifying the Emergency Console via radio, dialing 911 on any on-Center telephone, or dialing (301) 286-8661 for Greenbelt, (757) 824-1333 for WFF from any off-Center or cell phone. The attendant will initiate non-entry rescue procedures determined in the Pre-Entry Checklist (Confined Space Entry Permit).

Note: Attendants shall not enter a permit-required space to attempt rescue nor shall they leave their post unless relieved by another appropriately trained attendant.

## 6. CONFINED SPACE DECISION-MAKING FLOWCHART

The decision-making flowchart is included on the following page. The flowchart is to be used as a tool to guide the user on what actions are to be taken during the assessment of a confined space in a variety of situations.

Diagram 7.0  
Confined Space Decision Flow Chart



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### CHANGE HISTORY LOG

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Baseline	02/04/2006	Initial Release

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<http://gdms.gsfc.nasa.gov> TO VERIFY THAT THIS IS THE CORRECT VERSION PRIOR TO USE.